

# **EXHIBIT 2032**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**NATIONAL OILWELL VARCO, L.P.**

**Plaintiff,**

v.

**OMRON OILFIELD & MARINE, INC.,**

**Defendant.**

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**CIVIL ACTION NO. 1:12-CV-00773-SS**

**PLAINTIFF NATIONAL OILWELL VARCO, L.P.'S  
INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1), National Oilwell Varco, L.P. (NOV), makes the following disclosures. NOV may supplement these disclosures as additional information comes to light or as additional information becomes relevant in the future.

**A. Rule 26(a)(1)(A)(i):** the following individuals have discoverable information relevant to the disputed facts alleged with particularity in the pleadings:

**Plaintiff's Representative(s):**

1. Greg Martin  
Vice President, Global Operations of NOV  
1200 Cypress Creek Rd.  
Cedar Park, Texas 78613
  
2. Cliff Price  
Director of Global Operations M/D Totco  
1200 Cypress Creek Rd.  
Cedar Park, Texas 78613
  
3. Wayne Prejean  
11619 Versailles Lakes Lane  
Houston, Texas 77082

Plaintiff believes these individuals may have discoverable information or knowledge relating to the following subjects:

- a. Plaintiff's claims asserted in the pleadings;
- b. Sales, marketing and financial information of NOV and MD/Totco;
- c. Products produced by Defendant and methods of using the same, accused of infringing the '142 Patent;
- d. The reexaminations of the '142 patent by Pason; and
- e. The prior litigation of the '142 patent.

**Third Parties:**

1. Bobbie Bowden  
141 Rio Azule  
Seguin, TX 78150
2. Donald R. Comuzzi (Deceased)  
1631 Milam Bldg.  
115 East Travis St.  
San Antonio, Tx. 78205
3. Christopher L. Makay  
1631 Milam Bldg.  
115 East Travis St.  
San Antonio, Tx. 78205

Plaintiff believes these individuals may have discoverable information or knowledge relating to the conception, commercialization, reduction to practice, and initial prosecution of the '142 Patent.

**B. Rule 26(a)(1)(A)(ii):** NOV has or will produce all documents, data compilations and tangible things in its possession, custody or control that are relevant to disputed facts alleged with particularity in the pleadings including the following documents:

- a. all documents, pleadings, and transcripts that were part of the previous cases against Pason, IDM, and AutoDrill. NOV intends to withhold documents produced by these defendants relating to these defendant's products, sales, or company information that are covered by protective order(s) or which are unrelated to the claims or defenses in this lawsuit.

**C. Rule 26(a)(1)(A)(iii):** NOV is seeking an order from the Court that Defendant account and pay to NOV the damages to which it is entitled as a consequence of the infringement of the patent-in-suit, including lost profits and/or no less than a reasonable royalty. It is premature for NOV to provide precise calculations of this category of damages because NOV has not yet received documents from Defendant evidencing its respective profits, sales, and/or leases as a consequence of the infringement of the patent-in-suit.

**D. Rule 26(a)(1)(A)(iv):** After reasonable inquiry, NOV does not believe that it has an insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy any judgment against NOV in this case.

Dated: January 15, 2013

Respectfully submitted,

/s/ Robert M. Bowick  
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**CERTIFICATE OF SERVICE**

The foregoing document was served electronically in accordance with the Federal Rules of Civil Procedure and previous agreements between parties on Defendant's counsel of record:

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/s/Robert M. Bowick  
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